ACRE CONSULTANCY

UK REACH / EU REACH / PRACTICAL CHECKLIST

Changing your Only Representative

A practical checklist for transferring your REACH compliance arrangements.

Before you begin

An Only Representative (OR) transfer involves the overseas manufacturer or formulator, the outgoing OR and the incoming OR.

All parties should agree on what is being transferred, when the transfer will take place and who is responsible for each step before updating regulatory accounts or informing customers.

Transfer checklist by stakeholder

Tick each step as it is completed

1 Overseas manufacturer or formulator

- [ ] Confirm which company is appointing the new OR and which substances, products and importers are covered.
- [ ] Review the old OR contract, including notice periods, termination terms, fees and access to records.
- [ ] Sign the new OR agreement and issue an appointment letter confirming the new OR and start date.
- [ ] Authorise the ‘old’ and ‘new’ ORs to coordinate the handover.

2 ‘Old’ Only Representative

- [ ] Agree the handover plan, transfer date and responsibilities with the manufacturer and new OR.
- [ ] Provide a list of registrations and relevant submissions, including reference numbers, substance identities, tonnage bands and status.
- [ ] Support the regulatory transfer process and provide any required confirmations or documents.
- [ ] Share available dossiers, correspondence, study information and outstanding regulatory actions, subject to confidentiality and data access rights.
- [ ] Provide importer records and historical tonnage data, highlighting any gaps or discrepancies.

3 ‘New’ Only Representative

- [ ] Confirm eligibility to act as the new OR and set up the necessary regulatory accounts.
- [ ] Check the appointment documents, substances covered, importer list and transfer date.
- [ ] Coordinate the transfer of registrations through REACH-IT (EU) or Comply with UK REACH (UK).
- [ ] Confirm any transfer fees, payment responsibilities and additional data-sharing or consortium costs.
- [ ] Check access to registration dossiers, IUCLID files, letters of access and joint-submission information.
- [ ] Review substance identities, uses, tonnage bands, classifications, safety data sheets and any outstanding compliance issues.
- [ ] Set up importer and annual tonnage tracking, regulatory correspondence and record management.
- [ ] Notify affected importers in the EU/EEA or Great Britain of the new OR appointment and contact details.
- [ ] Confirm registrations and regulatory records are linked to the new OR and keep evidence of the transfer.
- [ ] Confirm affected importers have the new OR details and understand what is covered and from when.
- [ ] Record any outstanding actions, deadlines and ongoing compliance requirements.

Where EU REACH and UK REACH differ

EU REACH applies across the EU/EEA and continues to apply in Northern Ireland, while UK REACH applies in Great Britain (England, Scotland and Wales). The two systems operate independently.

EU registration changes are managed through 'REACH-IT', including the relevant legal entity change functionality. UK REACH uses 'Comply with UK REACH' and may require a different administrative route.

Fees and evidence requirements depend on the nature of the change: they should be confirmed for each case rather than assumed to apply automatically.

How ACRE can help

ACRE can manage the OR transfer, provide the necessary templates, review registration records and data access, and support ongoing REACH compliance.

We aim to make the transfer as straightforward as possible, with minimal disruption to your business and protection of confidential information.

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Key REACH definitions – EU and UK

Manufacturer

A company established in the EU/EEA or Great Britain (GB) that manufactures a chemical substance within the respective jurisdiction.

Importer

A company established in the EU/EEA or GB that brings a substance, mixture or article into its respective regulatory jurisdiction from outside that jurisdiction.

Downstream User

A company that uses a substance or mixture in the course of its industrial or professional activities, other than as a manufacturer or importer.

Distributor

A company that stores and places substances or mixtures on the market for third parties without using or chemically modifying them.

Article Producer or Supplier

A company that manufactures, assembles, imports or supplies articles whose function is determined primarily by their shape, surface or design rather than their chemical composition.

Only Representative

A person or organisation established in the EU/EEA or GB, appointed by an eligible supplier outside the respective jurisdiction to fulfil specified REACH importer obligations for covered substances. ACRE can fulfil both options.

General guidance only. The precise transfer route depends on the jurisdiction, regulatory assets, contractual rights and status of each submission.

Sources: ECHA, Only Representative guidance and REACH-IT resources; HSE, UK REACH roles, account guidance and fee schedules.